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STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

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TS Communication, Inc.)	omer cleared curicl
d/b/a Telecom*USA Long Distance)	\sim 1 \sim
Company of Illinois)	Docket No. 03- ()\4()
)	
Petition for Emergency and Expedited)	
Relief to Protect from Disclosure in)	
its Entirety for a Period of Not Less)	
Than Five Years Petitioner's 2002)	
Annual Report)	

PETITION FOR EMERGENCY AND EXPEDITED RELIEF

TS Communications, Inc. d/b/a Telecom*USA Long Distance Company of Illinois ("TS Communications"), by and through one of its attorneys, hereby petitions the Illinois Commerce Commission ("Commission") to grant to it the emergency relief requested herein. In support of this petition, TS Communications states as follows:

- 1. As a telecommunications carrier subject to the jurisdiction of the Commission, TS

 Communications is required to file with the Commission an annual report. TS Communications is prepared to file the requisite annual report with the Commission once this petition for proprietary treatment is granted.
- 2. Due to the content and nature of the filings, TS Communications's annual report will necessarily contain commerce and financial information that is highly sensitive, proprietary, confidential and the type of information which would be of particular interest to TS Communications's competitors and potential competitors.
- 3. Because the information that will be contained in TS Communications's annual report is so competitively sensitive, it is imperative that public disclosure of the proprietary information

that will be contained in its annual report be maintained under seal for a period not less than five years following the issuance of an Order herein by this Commission, since disclosure of this information any earlier would be likely to cause TS Communications serious competitive harm.

4. Section 7 of the Illinois Freedom of Information Act, 5 ILCS 140/7 (g) (1994) exempts from public disclosure "trade secrets and commercial or financial information . . .where such trade secrets or information are proprietary, privileged or confidential." The annual report that is the subject of this Petition falls within this exemption.

WHEREFORE, TS Communications, Inc. respectfully requests that the Commission issue an expedited Order protecting from disclosure in its entirety for a period of not less than five years TS Communications's 2002 annual report.

Respectfully submitted,

TS Communications, Inc. d/b/a Telecom*USA Long Distance Company of Illinois

By:

Darrell Townsley

Its Attorney

205 North Michigan Avenue

Suite 1100

Chicago, Illinois 60601

(312) 260-3533

Dated: February 27, 2003

STATE OF ILLINOIS)	
)	SS:
COUNTY OF COOK)	

VERIFICATION

Darrell Townsley, being first duly sworn, deposes and states that he is an attorney for TS Communications, Inc. d/b/a Telecom*USA Long Distance Company of Illinois that he has read the foregoing Petition for Emergency and Expedited Relief seeking proprietary treatment for its 2002 annual report and has knowledge of the contents thereof, and that the information therein contained are true to the best of his knowledge, information and belief.

Danill Jawasley

Darrell Townsley

SUBSCRIBED AND SWORN to before me this 27th day of February, 2003

Notary Public

My Commission Expires: August 9, 2005

